

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Sylvia Lewis McKay

DEFENDANTSFitness International LLC, d/b/a
LA Fitness(b) County of Residence of First Listed Plaintiff Berks

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Berks County

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Robin J. Gray, Esq.
P.O. Box 4322, Reading, PA 19606
(610) 689-0877

Attorneys (If Known)

D. Michael Beck, Esq.
3161 Michelson Drive, Suite 600
Irvine, CA 92612**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. 2000e, et seq. (Title VII)

Brief description of cause:

Plaintiff was terminated due to her race, African American

VII. REQUESTED IN COMPLAINT:☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE
05/19/2014

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 1037 South Street, Reading, PA 19602

Address of Defendant: 1183 Berkshire Blvd, Wyomissing, PA 19610

Place of Accident, Incident or Transaction: _____
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☒ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases
(Please specify) _____

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases
(Please specify) _____

ARBITRATION CERTIFICATION

(Check Appropriate Category)

- I, Robin J. Gray, counsel of record do hereby certify:
- ☒ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: 5/19/2014 Robin J. Gray
Attorney-at-Law

PA 58725
Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 5/19/2014 Rob J. Gray
Attorney-at-Law

PA 58725
Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

Sylvia Lewis McKay

CIVIL ACTION

v.
Fitness International LLC
d/b/a LA Fitness

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

Date

Attorney-at-law

Attorney for

Telephone

FAX Number

E-Mail Address

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SYLVIA LEWIS MCKAY	:	
Plaintiff	:	
	:	
v.	:	Civil Action No.
	:	
FITNESS INTERNATIONAL LLC	:	
d/b/a LA FITNESS	:	JURY TRIAL DEMANDED
Defendant	:	
	:	

COMPLAINT

AND NOW, comes the above named Plaintiff, Sylvia Lewis McKay, by and through her attorney, Robin J. Gray, and brings this action against the above named Defendant, and states the following in support thereof:

1. Plaintiff Sylvia Lewis McKay (hereinafter referred to as McKay), is an adult citizen of the Commonwealth of Pennsylvania residing at 1037 South Street, Reading, Berks County, Commonwealth of Pennsylvania 19602.
2. Defendant Fitness International LLC, d/b/a LA Fitness, (hereinafter referred to as "LA Fitness), is a national physical fitness company who properly conducts business at 1183 Berkshire Boulevard, Wyomissing, PA 19610. Highway, Reading, Berks County, Pennsylvania 19605.
3. Defendant is at all relevant times collectively and/or individually Plaintiff's employer within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. '2000e, et seq ("Title VII") and the

Pennsylvania Human Relations Act, as amended, 43 P.S. 951 et seq (“PIIRA”).

JURISDICTION AND VENUE

4. This court has jurisdiction n this matter pursuant to 28 U.S.C. 1331 and 1343 in that Plaintiff brings this action under Title VII. With respect to Plaintiff’s state law claims, this court has supplemental jurisdiction pursuant to 28 U.S.C. 1367.
5. Venue properly lies with this court in that the violations of Plaintiff’s rights under federal law occurred within the geographical boundaries of the United States District Court for the Eastern District of Pennsylvania.

ADMINISTRATIVE PROCEEDINGS

6. Plaintiff timely filed a charge and complaint of employment discrimination under Title VII with the Equal Employment Opportunity Commission (“EEOC”) and the Pennsylvania Human Relations Commission (“PHRC”).
7. More than one year has passed since Plaintiff filed her complaint of discrimination with the PHRC and charge of discrimination with the EEOC.
8. On or about February 26, 2014, Plaintiff received a Notice of Right to Sue from the Equal Employment Opportunity Commission.

FACTUAL ALLEGATIONS

9. On or about October 18, 2006, McKay, an African American female was hired as a janitor at Defendant LA Fitness.
10. On or about June 2009, McKay was promoted to Lead Janitor by Eric Moyer who was a manager at LA Fitness.
11. After June 2009, Eric Moyer was promoted to District Manager and Brooke Curley became McKay's manager along with Jessica Stroup, the operations manager.
12. McKay had reported issues about Brooke Curley to upper management regarding inappropriate jobs McKay was expected to do; i.e. cleaning the men's room when men were present.
13. When McKay was hired, there were only (1 the number of African American workers) African American workers.
14. After June 2009, when Brooke Curley and Jessica Stoup were managing LA Fitness, they began terminating the African American workers.
15. At the end of 2009 until March 2012, Jessica Stroup continually harassed McKay, making McKay perform double the workload without giving McKay the additional hours to perform the work
16. Stroup would also continually complain about Sylvia always asking "where is Sylvia" "why isn't Sylvia doing things," etc.
17. On or about March 2012, McKay's hours were cut without reason, but her job responsibilities remained the same.

18. Further, on or about March 2012, Stroup hired Ryan Peterson, a Caucasian Male initially as a janitor for LA Fitness.
19. Peterson was to be trained to fill a management position.
20. Stroup told Peterson that he was to train with McKay in her position as lead janitor so that he could learn all aspects of the job.
21. Instead of training to learn McKay's position, Peterson replaced McKay in her position.
22. Stroup cut McKay's hours under the guise that after Peterson was placed in the management position, McKay's hours would be restored.
23. McKay's hours were never restored.
24. At the time Peterson was hired in March 2012, McKay was the only African American janitor at LA Fitness.
25. On or about May or June 2012, Peterson was promoted to Facility Supervisor.
26. Instead of giving McKay her full hours back, Stroup had Peterson perform McKay's work as well as his new position as Facility Supervisor.
27. Prior to Peterson's promotion, McKay contacted Stroup as well as Brooke Curley about Peterson's promotion and that he was not doing a good job and there were several complaints. Instead of correcting Peterson, Peterson was promoted to Facilities manager.

28. Although McKay had been an employee at LA Fitness since it opened in 2006, she was not given the option to be promoted into a Facilities Managerial position. Instead, the job was given to Peterson, who did not have the experience, but who was a Caucasian Male.
29. Stroup would treat McKay different than she treated Peterson or other Caucasian workers.
30. Stroup placed unreasonable demands on McKay and was overly picky on anything McKay would do, whereas other Caucasian workers would not be subjected to the same scrutiny.
31. Stroup would also make snide remarks about McKay and her work, whereas Stroup would not make the same remarks about Caucasian workers.
32. Peterson asked Stroup about reinstating McKay's hours. Stroup did not answer Peterson, but stomped off into another room. Thereafter, Stroup started to treat Peterson and she did McKay because of Peterson's defense of McKay in the work place. (See Statement of Ryan Peterson attached hereto as Exhibit "A").
33. McKay filed a Charge of Discrimination with the EEOC on or about March 2012 when McKay was demoted and replaced by Peterson.
34. After filing the charge of discrimination, many of the racial comments and harassment increased toward McKay, trying to force McKay out of her employment with LA Fitness.

35. On or about December 2012, Peterson left LA Fitness due to the harassment he faced because he defended McKay.
36. After Peterson left LA Fitness, the eight hour shift was again available.
37. Although the eight hour shift was available, McKay was not offered the shift. Instead a new Caucasian cleaner was hired to start the eight hour shift, while McKay was still given forced to work her reduced hours and was no longer the lead janitor.
38. On or about December 23, 2012, McKay sent a letter to Brooke Curley, the district manager, stating her objection to another employee being hired for hours that McKay previously worked.
39. The response to McKay's letter was to terminate McKay on January 8, 2013 allegedly for poor work performance.
40. After McKay was terminated and the EEOC began investigating McKay's charge of discrimination, LA Fitness hired two African American janitors. However, prior to the EEOC investigation, LA Fitness terminated all of the African American janitors while under the management of Brooke Curley and Jessica Stroup.
41. As a result of LA Fitness' discriminatory and harassing treatment of McKay, McKay suffered severe economic losses.
42. As a further result of LA Fitness' discriminatory and harassing treatment of Plaintiff, Plaintiff suffered emotional harm.

**COUNT I
RACIAL DISCRIMINATION
UNDER THE PENNSYLVANIA HUMAN RELATIONS
ACT**

43. Plaintiff hereby incorporates paragraphs 1 through 42 as if fully set forth at length herein.

44. The actions of the aforesaid Defendant, by and through its agents, servants, workers, and/or employees, as herein described above, resulted in racially motivated hiring, promotion, and demotion practices, created a hostile work environment, and resulted in racial discrimination in violation of the PHRA.

45. The actions creating said racial discrimination and hostile work environment, include, but are not limited to, those actions listed in the above- described paragraphs.

46. As relief for Defendant's violation of Plaintiff's rights under Title VII, Plaintiff demands to be made whole, said relief to include, but not limited to, compensatory damages, past and future loss of wages, attorney's fees, costs, and such other relief as the court deems proper.

WHEREFORE, Plaintiff, Sylvia McKay, hereby requests this Honorable Court find in her favor and against Defendant for an amount in excess of \$150,000.00, plus attorney's fees, interest, costs, and such other relief as the court deems equitable and just.

COUNT II
TITLE VII: RACIAL DISCRIMINATION

47. Plaintiff hereby incorporates paragraphs 1 through 48 as if fully set forth at length herein.

48. The actions of the aforesaid Defendant, by and through its agents, servants, workers, and/or employees, as herein described above, resulted in racially motivated hiring and promotion practices, created a hostile work environment, and resulted in racial discrimination in violation of the Title VII.

49. The actions creating said racial discrimination and hostile work environment, include, but are not limited to, those actions listed in the above- described paragraphs.

50. As relief for Defendant's violation of Plaintiff's rights under Title VII, Plaintiff demands to be made whole, said relief to include, but not limited to, compensatory damages, punitive damages, past and future loss of wages, attorney's fees, costs, and such other relief as the court deems proper.

WHEREFORE, Plaintiff, Sylvia McKay, hereby requests this Honorable Court find in her favor and against Defendant for an amount in excess of \$150,000.00, plus attorney's fees, interest, costs, and such other relief as the court deems equitable and just.

Respectfully submitted



Robin J. Gray

EXHIBIT A

STATEMENT OF RYAN PETERSON

I, Ryan Peterson, residing at 510 ½ Raymond St. Reading, Pa 19605 , hereby make this statement regarding my knowledge of facts associated with Ms. Sylvia McKay's employment with LA Fitness.

I was hired by LA Fitness on or about March 2012. I am a Caucasian male. I was initially hired as a janitor. I was to be trained to fill a management position. Jessica Stroup, the operations manager, hired me and told me that I was to train with Sylvia McKay in her position so I would learn all aspects of the job. Instead of training to learn Ms. McKay's position, I replaced Ms. McKay in her position. Ms. Stroup cut Sylvia's hours under the guise that after I was placed in the management position, Ms. McKay would be restored to her full hours. This did not happen.

On or about May or June of 2012, I was promoted to Facility Supervisor. However, instead of giving Sylvia her hours back, I was performing Sylvia's job as well as my job as Facility Supervisor. Sylvia never had her hours returned to her.

Ms. Stroup would constantly treat Sylvia, an African American female, different that she treated me or other Caucasian workers. Ms. Stroup placed unreasonable demands upon Sylvia, although her hours were cut and was overly picky on anything Sylvia would do, whereas other Caucasian workers would not be subjected to the same scrutiny.

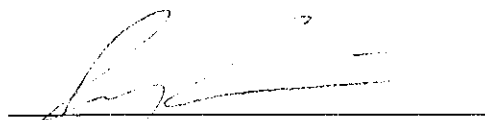
Ms. Stroup would always make snide remarks about Sylvia, again being overly picky whereas she did not make such remarks about other Caucasian workers.

I asked Ms. Stroup one day about Sylvia and giving Sylvia her hours back. Ms. Stroup did not answer me, but stomped off and into another room. Thereafter, Ms. Stroup started to treat me as she treated Sylvia because of my defense of Sylvia in the workplace.

At the time of my employment, Sylvia McKay was the only African American employee in our department at LA Fitness. I have since learned that after Sylvia's filing of discrimination with the EEOC, LA Fitness has hired two African American janitorial workers. Until this time, LA Fitness and especially Ms. Stroup found it necessary to discriminate and chase out any African American workers.

Due to the retaliation by Ms. Stroup and my obtaining a higher paying job, I left my employment at LA Fitness on December 2012.

I verify that the statements made in this Statement are true and correct to the best of my knowledge and belief.



Ryan Peterson

Date: 12/10/13